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July 16, 2020

Hon. Stewart D. Aaron  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Mazzocchi v. Windsor Owners Corp. et al., 11-cv-07913

Dear Magistrate Judge Aaron:

I write pursuant to your Order, Document No. 276, that defendants file a letter with the Court responding to three questions. This letter is that response.

- (1) The full name of "Howard", mentioned on EP000056, is Howard Lazarus, who was at the time and I am informed remains General Counsel of Tudor Realty Corp. According to Ms. Dunphy, who wrote the mail that is redacted on EP 000056, the advice contained in the email was given to the Windsor Board by Mr. Lazarus acting as the Tudor General Counsel. Tudor was at that time a co-defendant with Ms. Dunphy and Windsor in the instant action.
- (2) "Cholst" is Bruce Cholst, who was a member of the law firm that was then representing Windsor and the individual members of the Windsor Board in the instant action.
- (3) I am informed by Ms. Dunphy, who received the email mentioned on EP000068, that at the time Jeffrey Reich was an attorney for Windsor, and at some point around the time of the email he was General Counsel to Windsor.

Sincerely yours,

/s/ Jeffrey E. Glen

Jeffrey E. Glen

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■, NJ ■ Philadelphia Washington, DC ■ Newark, PA